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Attorneys for Defendants

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

INDUSTRIAL TECHNOLOGY
RESEARCH INSTITUTE,

Plaintiff,

vs.

LG ELECTRONICS, INC.,
LG ELECTRONICS U.S.A., INC.
and LG ELECTRONICS MOBILECOMM
U.S.A., INC.,

Defendants.

Case No. 3:14-cv-02834-H-RBB

Hon. Marilyn L. Huff
Hon. Ruben B. Brooks

JOINT MOTION TO DISMISS

1 Plaintiff and Counterclaim Defendant Industrial Technology Research Institute
2 (“ITRI”) and Defendants and Counterclaim Plaintiffs LG Electronics, Inc., LG
3 Electronics U.S.A., Inc., and LG Electronics MobileComm U.S.A., Inc. (collectively,
4 “LG”) have settled all claims and counterclaims against each other. Accordingly,
5 pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, LG and ITRI hereby
6 jointly move the Court to dismiss all claims by ITRI against LG with prejudice and all
7 counterclaims by LG against ITRI with prejudice. The parties agree that,
8 notwithstanding the foregoing, in the event that any of the patents-in-suit are asserted
9 against LG again in the future, LG may file claims for declaratory judgment of
10 invalidity and non-infringement of those asserted claims. Each party further agrees to
11 bear its own costs, expenses, and attorneys’ fees.
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14 LG and ITRI agree to this joint motion.
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1 Dated: August 25, 2015

By: /s/ Alfonso Garcia Chan

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CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2015, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

By: /s/ Jeffrey K. Sherwood
Jeffrey K. Sherwood